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November 29, 2006

VIA HAND DELIVERY AND E-FILE

The Honorable Kent A. Jordan
U.S. District Court for the District of
Delaware
844 North King Street, Room 4209
Wilmington, DE 19801

Re: Sokolove v. City of Rehoboth Beach, No. 05-514 (KAJ)

Dear Judge Jordan:

I write on behalf of all plaintiffs with respect to defendants' letter of November 27, 2006, regarding their payment of the \$2,001.00 due pursuant to the Stipulated Consent Order and Judgment ("Consent Order") and to advise the Court of the impact of this payment on plaintiffs' pending Motion for Contempt.

First, plaintiffs agree that defendants' payment of the \$2,001.00 renders moot the Motion for Contempt to the extent it sought relief based on defendants' failure to make this payment. Nevertheless, the Court must still address the other issues raised by the Motion for Contempt, including whether defendants have violated the Consent Order by codifying a selective enforcement mechanism and whether plaintiffs are entitled to recover the fees and expenses they incurred in connection with the Motion for Contempt.

Second, defendants' November 27 letter tacitly concedes that defendants had not complied with and were in contempt of the Consent Order. Plaintiffs believe that this concession lends considerable weight to their request for fees and expenses in connection with the Motion for Contempt.

Third, defendants' letter is yet another example of the point made in footnote 1 of the Reply Memorandum In Support Of Plaintiffs' Motion For Contempt: that defendants' repeated failure to respond to (or in this case apparently even to review) plaintiffs' communications has prolonged the suit and increased the costs associated therewith.

WIL:62870.1/sok014-230196

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Should Your Honor have any questions regarding the foregoing or the pending Motion for Contempt, plaintiffs are available at the Court's convenience.

Respectfully,

A handwritten signature in black ink, appearing to read "Todd C. Schiltz", written in a cursive style.

Todd C. Schiltz (#3253)

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

TCS/bg

cc: Clerk of Court (by e-filing)
Chase Brockstedt, Esq. (by e-filing)
Daniel Griffith, Esq. (by e-filing)